

Dane L. Hines (#7886)
Attorney at Law
43 East 200 North
Provo, Utah 84606
Tel: 801-379-0300 Fax: (801) 375-2590
Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
District of Utah**

In the Matter of:	}	
	}	
	}	Case No. 24-23670
Martin David Jacks	}	
Jennie Ann Jacks	}	Chapter 13
	}	
	}	Hon. Peggy Hunt
Debtor(s)	}	

DEBTORS' OBJECTION TO NationStar Mortgage,LLC's motion for Relief of Stay

Come now Debtor(s), by and through counsel, Dane L. Hines, and hereby objects to NationStar Mortgage,LLC's Motion for Relief of Stay. Debtor(s) deny that they have post petition arrearages in the amounts claimed. Specifically debtors made payment by wire transfer of \$ 3,447.12 on 1/30/25. To the extend that there exists actual post petition arrearages debtor(s) propose to cure same in a work out plan with Movant. Debtor(s) assert that there is equity in the property, that the property is necessary for debtor's reorganization and that Movant's interest is adequately protected.

Wherefore, Debtor(s) pray(s) the Court enter an order denying the motion for relief of stay.

/S/ Date: February 6, 2025
Dane L Hines, Attorney for Debtor(s)